

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY (TRENTON)</b>	
<b>RAS Citron, LLC</b> 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 470-321-7112 Attorneys For Secured Creditor <b>Nationstar Mortgage LLC D/B/A Mr. Cooper</b>  Shauna Deluca, Esq. (SD-8248)	CASE NO.: 19-21634-MBK  CHAPTER 13  <b>Objection to Confirmation of Debtor's Chapter 13 Plan</b>
<b>In Re:</b>  <b>Roseanne T Puleo,</b>  <b>Debtor.</b>	

### **OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

Nationstar Mortgage LLC D/B/A Mr. Cooper ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 2), and states as follows:

1. Debtor, Roseanne T Puleo, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on June 11, 2019.
2. Secured Creditor holds a security interest in the Debtor's real property located at 432 Holmes Dr, Burlington, NJ 08016-2855, by virtue of a Mortgage recorded on June 23, 2006 in Book 10972, at Page 444 of the Public Records of Burlington County, NJ. Said Mortgage secures a Note in the amount of \$184,000.00.
3. The Debtor filed a Chapter 13 Plan on June 11, 2019.
4. The Plan includes payments toward the Note and Mortgage with Secured Creditor, however the figures used are inaccurate. It is anticipated that Secured Creditor's claim will show the pre-petition arrearage owed to Secured Creditor is \$33,864.71, whereas the Plan proposes to pay only \$27,000.00. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Secured Creditor objects to any plan which proposes to pay it anything less than \$33,864.71 as the pre-petition arrearage over the life of the plan.

5. The Plan does not appear feasible due to inadequate treatment of Secured Creditor's claim. Thus, the plan violates the provisions of 11 U.S.C. § 1325(a)(3) and cannot be confirmed.

**WHEREFORE**, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

RAS Citron, LLC  
Attorney for Secured Creditor  
130 Clinton Road, Suite 202  
Fairfield, NJ 07004  
Telephone Number 470-321-7112

By: /s/Shauna Deluca  
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NJ Bar Number SD-8248  
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**CERTIFICATION OF SERVICE**

1. I, Shauna Deluca, represent Nationstar Mortgage LLC D/B/A Mr. Cooper in this matter.
2. On June 19, 2019, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

June 19, 2019

RAS Citron, LLC  
Attorney for Secured Creditor  
130 Clinton Road, Suite 202  
Fairfield, NJ 07004  
Telephone Number 470-321-7112

By: /s/Shauna Deluca  
Shauna Deluca, Esquire  
NJ Bar Number SD-8248  
Email: sdeluca@rasflaw.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Brad J. Sadek Sadek and Cooper 1315 Walnut Street Ste 502 Philadelphia, PA 19107	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Roseanne T Puleo 432 Holmes Avenue Burlington, NJ 08016	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)